

EXHIBIT A

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION
BUREAU *et al*,

Plaintiffs,

vs.

DOUGLAS MACKINNON, *et al*.

Case No. 1:16-cv-00880

Defendants.

**PLAINTIFFS' FIRST SET OF INTERROGATORIES
TO DEFENDANT NORTHERN RESOLUTION GROUP, LLC**

Pursuant to F.R.C.P. 33, Plaintiffs Consumer Financial Protection Bureau and People of the State of New York (collectively, "Plaintiffs") request Defendant Northern Resolution Group, LLC answer each of the following interrogatories within 30 days of service of this discovery request.

INSTRUCTIONS

- A. The instructions set forth in Fed. R. Civ. P. 26, 33, and Local Rule 26 are incorporated herein by reference. Responses should be supplemented as required by Fed. R. Civ. P. 26(e).
- B. Unless otherwise specified, these Interrogatories request information for the period of January 1, 2009 to the present. If it is necessary to refer to a prior time to fully answer an Interrogatory, you should do so.

- C. In answering these Interrogatories, furnish all information that is known or available to you, regardless of whether the information is in your or your agents' possession, custody, or control.
- D. If you cannot answer all or part of any interrogatory after exercising due diligence to secure the information to do so, answer the interrogatory to the extent possible, specifying why full compliance is not possible, stating whatever information or knowledge you have concerning the unanswered portion, and detailing what you did in attempting to secure the unknown information.
- E. If you assert a claim of privilege in responding to or objecting to any interrogatory, state the nature of the privilege and the basis for the claim in accordance with Local Rule 26(e).
- F. If you timely object to any part of the interrogatory, specifically state the reason(s) for the objection(s) and answer all parts of such interrogatory to which you do not object.
- G. Any Documents produced in response to an interrogatory shall be produced in accordance with the attached Discovery Requests Document Submission Standards.
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- K. The singular shall include the plural, and the plural shall include the singular.
- L. If any material called for by these Interrogatories contains sensitive personally identifiable information or sensitive health information of any individual, contact

Plaintiffs' counsel before producing this material to discuss ways to protect such information during productions.

DEFINITIONS

All definitions and rules of construction set forth in the Federal Rules of Civil Procedure, including Rule 33, and Local Rule 26(d) are incorporated herein by reference. In addition to those definitions and rules, the following terms used in these Interrogatories shall have the meanings set forth as follows:

- A. **"Principal"** means the amount written- or charged-off by the originator of the debt.
- B. **"You"** and **"Your"** means Defendant Northern Resolution Group, LLC and any agents acting on its behalf including, but not limited to employees of Defendants herein, accountants, attorneys, or representatives.

INTERROGATORIES

1. State whether You have ever relied on the advice of counsel in determining the amount You added to the Principal of a consumer debt for collection purposes, and for each such instance describe: (a) the name and address of the counsel on whose advice You relied, (b) the purpose and duration of the attorney-client relationship, (c) the date of the advice, and (d) whether the advice was in writing, regardless of the format.
2. Will You claim as a defense in this action the reliance on the advice of counsel? If so, state each claim as to which You intend to rely on the defense of advice of counsel and the basis of such defense.
3. Identify all companies and individuals who performed payment processing services for You, including, without limitation, NCW Billing, LLC, ADMS, LLC, Elite Payment Solutions, LLC, and Integrity Advance, LLC. For each company or individual, list (a) the time period for which such payment processing services were provided; and (b) the third party payment processing company to which claims were submitted (for example, Billing Tree).

Dated: June 5, 2017

Respectfully submitted,

/s/James M. Morrissey
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CERTIFICATE OF SERVICE

I hereby certify that on June 5, 2017, a copy of **PLAINTIFFS' FIRST SET OF INTERROGATORIES TO NORTHERN RESOLUTION GROUP, LLC** was served via UPS Standard Overnight shipping and electronic mail on the following:

Eric Soehnlein, Esq.
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Counsel for Defendants Gregory MacKinnon, Angela Burforf, Megan VanDeViver, Vantage Point Services, LLC, and Payment Management Solutions, LLC.

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Counsel for Mark Gray and Delray Capital, LLC

/s/ James M. Morrissey
JAMES M. MORRISSEY
Attorney for Plaintiff the People of the State of New York

UNITED STATES DISTRICT COURT
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CONSUMER FINANCIAL PROTECTION
BUREAU *et al*,

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DOUGLAS MACKINNON, *et al*.

Case No. 1:16-cv-00880

Defendants.

**PLAINTIFFS' FIRST SET OF INTERROGATORIES
TO DEFENDANT DOUGLAS MACKINNON**

Pursuant to F.R.C.P. 33, Plaintiffs Consumer Financial Protection Bureau and People of the State of New York (collectively, "Plaintiffs") request Defendant Douglas MacKinnon answer each of the following interrogatories within 30 days of service of this discovery request.

INSTRUCTIONS

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- A. **"Principal"** means the amount written- or charged-off by the originator of the debt.
- B. **"You"** and **"Your"** means Defendant Douglas MacKinnon and any agents acting on his behalf including, but not limited to employees of Defendants herein, accountants, attorneys, or representatives.

INTERROGATORIES

1. State whether You have ever relied on the advice of counsel in determining the amount You added to the Principal of a consumer debt for collection purposes, and for each such instance describe: (a) the name and address of the counsel on whose advice You relied, (b) the purpose and duration of the attorney-client relationship, (c) the date of the advice, and (d) whether the advice was in writing, regardless of the format.
2. Will You claim as a defense in this action the reliance on the advice of counsel? If so, state each claim as to which You intend to rely on the defense of advice of counsel and the basis of such defense.
3. Identify all companies and individuals who performed payment processing services for You, Northern Resolution Group, LLC, Enhanced Acquisition, LLC and Delray Capital, LLC, including, without limitation, NCW Billing, LLC, ADMS, LLC, Elite Payment Solutions, LLC, and Integrity Advance, LLC. For each company or individual, list (a) the time period for which such payment processing services were provided; and (b) the third party payment processing company to which claims were submitted (for example, Billing Tree).

Dated: June 5, 2017

Respectfully submitted,

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BUREAU *et al*,

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Case No. 1:16-cv-00880

Defendants.

**PLAINTIFFS' FIRST SET OF INTERROGATORIES
TO DEFENDANT ENHANCED ACQUISITIONS, LLC**

Pursuant to F.R.C.P. 33, Plaintiffs Consumer Financial Protection Bureau and People of the State of New York (collectively, "Plaintiffs") request Defendant Enhanced Acquisitions, LLC answer each of the following interrogatories within 30 days of service of this discovery request.

INSTRUCTIONS

- A. The instructions set forth in Fed. R. Civ. P. 26, 33, and Local Rule 26 are incorporated herein by reference. Responses should be supplemented as required by Fed. R. Civ. P. 26(e).
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- E. If you assert a claim of privilege in responding to or objecting to any interrogatory, state the nature of the privilege and the basis for the claim in accordance with Local Rule 26(e).
- F. If you timely object to any part of the interrogatory, specifically state the reason(s) for the objection(s) and answer all parts of such interrogatory to which you do not object.
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Plaintiffs' counsel before producing this material to discuss ways to protect such information during productions.

DEFINITIONS

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- A. **"Principal"** means the amount written- or charged-off by the originator of the debt.
- B. **"You"** and **"Your"** means Defendant Enhanced Acquisitions, LLC and any agents acting on its behalf including, but not limited to employees of Defendants herein, accountants, attorneys, or representatives.

INTERROGATORIES

1. State whether You have ever relied on the advice of counsel in determining the amount You added to the Principal of a consumer debt for collection purposes, and for each such instance describe: (a) the name and address of the counsel on whose advice You relied, (b) the purpose and duration of the attorney-client relationship, (c) the date of the advice, and (d) whether the advice was in writing, regardless of the format.
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Dated: June 5, 2017

Respectfully submitted,

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CERTIFICATE OF SERVICE

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Attorney for Plaintiff the People of the State of New York

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION
BUREAU *et al*,

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DOUGLAS MACKINNON, *et al*.

Case No. 1:16-cv-00880

Defendants.

**PLAINTIFFS' FIRST SET OF INTERROGATORIES
TO DEFENDANT DELRAY CAPITAL, LLC**

Pursuant to F.R.C.P. 33, Plaintiffs Consumer Financial Protection Bureau and People of the State of New York (collectively, "Plaintiffs") request Defendant Delray Capital, LLC answer each of the following interrogatories within 30 days of service of this discovery request.

INSTRUCTIONS

- A. The instructions set forth in Fed. R. Civ. P. 26, 33, and Local Rule 26 are incorporated herein by reference. Responses should be supplemented as required by Fed. R. Civ. P. 26(e).
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DEFINITIONS

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- A. **"Principal"** means the amount written- or charged-off by the originator of the debt.
- B. **"You"** and **"Your"** means Defendant Delray Capital, LLC and any agents acting on its behalf including, but not limited to employees of Defendants herein, accountants, attorneys, or representatives.

INTERROGATORIES

1. State whether You have ever relied on the advice of counsel in determining the amount You added to the Principal of a consumer debt for collection purposes, and for each such instance describe: (a) the name and address of the counsel on whose advice You relied, (b) the purpose and duration of the attorney-client relationship, (c) the date of the advice, and (d) whether the advice was in writing, regardless of the format.
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Dated: June 5, 2017

Respectfully submitted,

/s/James M. Morrissey

JAMES M. MORRISSEY

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/s/ Stefanie Isser Goldblatt

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*Attorneys for Plaintiff Consumer Financial
Protection Bureau*

CERTIFICATE OF SERVICE

I hereby certify that on June 5, 2017, a copy of **PLAINTIFFS' FIRST SET OF INTERROGATORIES TO DELRAY CAPITAL, LLC** was served via UPS Standard Overnight shipping and electronic mail on the following:

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Attorney for Plaintiff the People of the State of New York

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Defendants.

**PLAINTIFFS' FIRST SET OF INTERROGATORIES
TO DEFENDANT MARK GRAY**

Pursuant to F.R.C.P. 33, Plaintiffs Consumer Financial Protection Bureau and People of the State of New York (collectively, "Plaintiffs") request Defendant Mark Gray answer each of the following interrogatories within 30 days of service of this discovery request.

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Dated: June 5, 2017

Respectfully submitted,

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/s/ Stefanie Isser Goldblatt
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